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12 *Allegiant Air, LLC*

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15 UNITED STATES DISTRICT COURT
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17 DISTRICT OF NEVADA

18 ALI BAHREMAN,

19 Plaintiff,

20 v.

21 ALLEGIANT AIR, L.L.C. and
22 TRANSPORT WORKERS UNION OF
23 AMERICA LOCAL 577,

24 Defendants.

25 Case No. 2:20-cv-00437-RFB-DJA

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28 **STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
TO REPLY IN SUPPORT OF
MOTIONS TO DISMISS PLAINTIFF'S
AMENDED COMPLAINT**

(FIRST REQUEST)

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30 IT IS HEREBY STIPULATED by and between Plaintiff ALI BAHREMAN ("Plaintiff"),
31 through his counsel, Marquis Aurbach Coffing, Defendant, ALLEGIANT AIR, L.L.C.
32 ("Allegiant"), by and through its counsel, Jackson Lewis P.C., and Defendant TRANSPORT
33 WORKERS UNION OF AMERICA LOCAL 577 ("TWUA") by and through its counsel,
34 McCracken, Stemerman & Holsberry, and Phillips, Richard & Rind, P.A., (collectively, Allegiant
35 and TWUA are "Defendants"), that Defendants shall have a fourteen day extension up to and
36 including July 27, 2020, in which to file their respective replies in support of their Motions to

1 Dismiss Plaintiff's Amended Complaint. This Stipulation is submitted and based upon the
2 following:

- 3 1. Plaintiff filed an Amended Complaint on May 27, 2020. ECF No. 26.
- 4 2. Defendants filed Motions to Dismiss Plaintiff's Amended Complaint on June 10,
5 2020. ECF Nos. 30-31.
- 6 3. Plaintiff filed a Response to Defendants' Motions to Dismiss on July 6, 2020. ECF
7 No. 35.
- 8 4. Defendants' replies are presently due on July 13, 2020.
- 9 5. Due to the press of other matters Defendants' counsel must attend to, and in order
10 to adequately reply, counsel for Defendants require additional time. Counsel for Defendants
11 request a fourteen (14) day extension, up to and including July 27, 2020, to file their respective
12 replies.
- 13 6. This is the first request for an extension of time for Defendants to file replies in
14 support of Motions to Dismiss Plaintiff's Amended Complaint.
- 15 7. This request is made in good faith and not for the purpose of delay.

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1 8. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim and/or defense held by any party.

3 Dated this 8th day of July, 2020.

4 **JACKSON LEWIS P.C.**

5 **MARQUIS AURBACH COFFING**

6 /s/ Joshua A. Sliker

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13 **McCRACKEN, STEMERMAN &**
14 **HOLSBERRY**

15 /s/ Osnat K. Rind

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5 /s/ Blaine Hutchison

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11 Springfield, Virginia 22160

12 *Attorneys for Plaintiff Ali Bahreman*

25 **IT IS SO ORDERED.**

26 
27 RICHARD F. BOULWARE, II
28 UNITED STATES DISTRICT JUDGE

DATED this 13th day of July, 2020.